

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

SHABTAI SCOTT SHATSKY, et al.,

Plaintiffs,

-against-

THE PALESTINE LIBERATION  
ORGANIZATION and THE PALESTINIAN  
AUTHORITY,

Defendants.

Case No.: 18-cv-12355 (MKV)(DCF)

**NOTICE OF CONSTITUTIONAL  
CHALLENGE**

Pursuant to Rule 5.1(a)(2) of the Federal Rules of Civil Procedure, Defendants Palestine Liberation Organization and the Palestinian Authority hereby notify the Attorney General of the United States that they have challenged the constitutionality of the Promoting Security and Justice for Victims of Terrorism Act of 2019 (“PSJVTA”) (codified at 18 U.S.C. § 2334(e)), arguing that it cannot be applied to establish personal jurisdiction over them in this case without violating, *inter alia*, the Due Process Clause of the Fifth Amendment to the U.S. Constitution and the separation of powers doctrine. *See* ECF No. 116 at 1-24.

Dated: August 25, 2021

Respectfully submitted,

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